



Gerald S Lepre Jr &lt;gleprejr.ljklaw@gmail.com&gt;

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**Re: Dlubak v. Cuddy - Docket No.: 2022-1171-Civil**

5 messages

Louis Kroeck &lt;lou@ljk-law.com&gt;

Thu, Feb 16, 2023 at 1:16 PM

To: "Gino F. Peluso, Esq." &lt;gp@attorneypeluso.com&gt;, Gerald S Lepre Jr &lt;gleprejr.ljklaw@gmail.com&gt;

Hi Attorney Peulso,

We have filed a complaint and motion on the bankruptcy docket. Are you able to accept service for Mr. Cuddy?

On Fri, Oct 21, 2022 at 11:34 AM Gino F. Peluso, Esq. <gp@attorneypeluso.com> wrote:

Good afternoon Lou,

You would have the burden of proof of any allegation of fraud in the Bankruptcy Court. You should notify the Common Pleas Court of the Bankruptcy filing and provide them with the case number, so that no one is in contempt of the automatic stay protection afforded by my client's Chapter 7 filing. I trust that this answers your questions.

Gino F. Peluso, Esq.  
One Peluso Place - Suite A  
[2692 Leechburg Road](#)  
Lower Burrell, PA 15068  
Office: 724-339-8710  
Fax: 724-339-3803  
[www.attorneypeluso.com](http://www.attorneypeluso.com)  
[gp@attorneypeluso.com](mailto:gp@attorneypeluso.com)

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> On 10/21/2022 11:22 AM EDT Louis Kroeck <lou@ljk-law.com> wrote:

>

>

> Hi Attorney Peluso,

>

> Keep in mind there are allegations of fraud in this complaint that may  
> not be discharged by bankruptcy. Please kindly list my client's as  
> creditors and provide me with a copy of the petition when it is filed.  
> Do you have any preference on how I notify the court of the pending  
> bankruptcy? I will not default him or otherwise continue to pursue  
> this until we get some clarity on everything. I would urge your client  
> to get an attorney to take a look at his insurance policy to try and  
> obtain coverage for this lawsuit.

>

> Have a nice weekend,

>

> Thank you,

>

> -Lou Kroeck

>

> On Thu, Oct 20, 2022 at 12:48 PM Gino F. Peluso, Esq.

> <[gp@attorneypeluso.com](mailto:gp@attorneypeluso.com)> wrote:

>>

> > Good afternoon Attorney Kroeck,

> >

> > Thank you for contacting my office. I am representing Mr. Cuddy in his Chapter 7 Bankruptcy case. The filing essentially stops the lawsuit action immediately, at this time, with the end result being a discharge of the debt being claimed following a conclusion of his Chapter 7 case. No further action can be taken on the lawsuit either during or after the course of my client's proceedings. I trust that this information is helpful to you and would ask that you please feel free to contact me if you should have any further questions or concerns.

> >

> > Vey truly yours,

> >

> >

> > Gino F. Peluso, Esq.

> > One Peluso Place - Suite A

> > [2692 Leechburg Road](#)

> > [Lower Burrell, PA 15068](#)

> > [Office: 724-339-8710](#)

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> > \*\*\*\*\*

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> > \*\*\*\*\*

> >

> > > On 10/20/2022 12:25 PM EDT Louis Kroeck <[lou@ljk-law.com](mailto:lou@ljk-law.com)> wrote:

> > >

> > >

> > > Hi Attorney Peluso,

> > >

> > > Nice to meet you. Will you be filing this with the court or

> > > representing Mr. Cuddy in the lawsuit?

> > >

> > > On Wed, Oct 19, 2022 at 9:40 AM Gino F. Peluso, Esq.

> > > <[gp@attorypepeluso.com](mailto:gp@attorypepeluso.com)> wrote:

> > > >

> > > > Dear Attorney Kroeck,

> > > >

> > > > Attached please find correspondence, along with Notice of Bankruptcy and Suggestion of Bankruptcy, in relation to Clifford W. Cuddy d/b/a Cuddys Construction.

> > > >

> > > > Very truly yours,

> > > >

> > > >

> > > > Stacey L. Vincler,

> > > > Paralegal to Gino F. Peluso, Esq.

> > > >

> > > > One Peluso Place - Suite A

> > > > [2692 Leechburg Road](#)

> > > > [Lower Burrell, PA 15068](#)

> > > > [724-339-8710 Phone](#)

> > > > [724-339-3803 Fax](#)

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sender to this effect. Thank you.

> > > \*\*\*\*\*

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> >>

> >>

> >> --

> >> Louis J. Kroeck IV

> >> Please note our recent change of address:

> >

> >> LJK LAW PLLC

> >> 412-712-7605

> >> [1200 Sarah St.](#)

> >> [Pittsburgh, PA 15203](#)

>

>

>

> --

> Louis J. Kroeck IV

> Please note our recent change of address:

>

> LJK LAW PLLC

> 412-712-7605

> [1200 Sarah St.](#)

> [Pittsburgh, PA 15203](#)

--  
Louis J. Kroeck IV

Please note our recent change of address:

LJK LAW PLLC  
412-712-7605  
[1200 Sarah St.](#)  
[Pittsburgh, PA 15203](#)

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Gino F. Peluso, Esq. <gp@attorneypeluso.com>

Thu, Feb 16, 2023 at 2:07 PM

To: Louis Kroeck <lou@ljk-law.com>, Gerald S Lepre Jr <gleprejr.ljklaw@gmail.com>

Good afternoon,

Please serve Mr. Cuddy directly.

Thank you,

Gino F. Peluso, Esq.  
One Peluso Place - Suite A  
2692 Leechburg Road  
Lower Burrell, PA 15068  
Office: 724-339-8710  
Fax: 724-339-3803  
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effect. Thank you.

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**Gino F. Peluso, Esq.** <gp@attorneypeluso.com>  
To: Louis Kroeck <lou@ljk-law.com>, Gerald S Lepre Jr <gleprejr.ljklaw@gmail.com>

Mon, Feb 20, 2023 at 4:45 PM

Good afternoon,

Our office is in receipt of your fax of February 16, 2023 enclosing the following:

1. Summons
2. Adversary Complaint;
3. Order/Notice of the Adversary Proceeding to Comply with Early Conference and
4. Early Conference Certification and Stipulation.

Items #3 and #4 were not attached to the fax. Please forward the documents to our office.

Thank you,

Stacey L. Vincler,  
Paralegal to Gino F. Peluso, Esq.

One Peluso Place - Suite A  
2692 Leechburg Road  
Lower Burrell, PA 15068  
724-339-8710 Phone  
724-339-3803 Fax

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**Gerald S Lepre Jr** <gleprejr.ljklaw@gmail.com>  
To: "Gino F. Peluso, Esq." <gp@attorneypeluso.com>

Tue, Feb 21, 2023 at 12:00 PM

Please see attached and please confirm receipt of the email with the attachments.

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Sincerely,  
Gerald S. Lepre, Jr.  
Paralegal to Louis J. Kroeck IV, Esquire  
LJK LAW, PLLC  
1200 Sarah Street  
Pittsburgh, PA 15203  
Cell: 1 (412) 927-8942

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## 9 attachments

 **Form 158 (Summons for WWB BM MBM TPA JAD).pdf**  
35K

 **show\_temp (3).pdf**  
20K

-  **show\_temp.pdf**  
20K
-  **gov.uscourts.pawb.379645.8.0.pdf**  
6K
-  **1-1.pdf**  
259K
-  **show\_temp (1).pdf**  
57K
-  **proposed order.pdf**  
102K
-  **show\_temp (2).pdf**  
96K
-  **1.pdf**  
9048K

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**Gino F. Peluso, Esq.** <gp@attorneypeluso.com>  
To: Gerald S Lepre Jr <gleprejr.ljklaw@gmail.com>

Tue, Feb 21, 2023 at 2:31 PM

Documents were received.

Thank you,

Stacey L. Vincler,  
Paralegal to Gino F. Peluso, Esq.

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